

Exhibit 30

3505-31

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

MDL No. 2913
Case No. 19-md-02913-WHO

This document relates to:

ALL ACTIONS

PLAINTIFF FACT SHEET – SCHOOL DISTRICTS

Please provide the following information for each school district plaintiff that has filed a complaint in the *In Re Juul Labs, Inc., Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 13-2913. In completing this Plaintiff Fact Sheet (PFS), you are under oath and must provide information that is true and correct to the best of your knowledge, information and belief. Please do not leave any questions unanswered or blank. If you are filling out this Fact Sheet in hard copy, use additional sheets as needed to fully respond.

You may and should consult with your attorney if you have any questions regarding the completion of this form.

This Plaintiff Fact Sheet constitutes discovery responses subject to the Federal Rules of Civil Procedure. Information provided will only be used for purposes related to this litigation and may be disclosed only as permitted by the Protective Order.

INSTRUCTIONS:

1. “You” and “Your” as used throughout this PFS means each school district Plaintiff named in this action.
2. As used throughout this PFS and consistent with the Court’s October 9, 2020 Order (Docket No. 1038), “any existing report, survey, analysis, study, or other document that tracks or otherwise provides an overview of” the issues addressed by the particular question (for example, the prevalence of use of tobacco or nicotine products, vaping or e-cigarettes, alcohol, drugs, other illicit substances, and expenditures made to address the use of these products or substances) means information that has already been compiled. If these types of documents exist, they should be produced. That already compiled information is only available or stored via email is not a reason for it not to be produced. Each Plaintiff should diligently investigate whether it has compiled in any form the information sought. This investigation might involve a district employee asking an appropriate person at each school to provide the district with a document/report that has already compiled information. However, if information has not been compiled or summarized on these topics it does not need to be located, described or produced (i.e., You are not required to locate, compile, sort, describe or

produce underlying records that might show, for example, the prevalence of use or expenses incurred to address these products or substances).

3. Please attach additional pages where necessary.

I. CASE INFORMATION

1. Plaintiff:

San Francisco Unified School District

2. Case name:

San Francisco Unified School District v. Juul Labs, Inc., et al.

3. Case number: 3:19-cv-08177
-

4. Name of the court in which the complaint was initially

filed: United States District Court For The Northern District of California

5. Filing date of the complaint: Dec 16 2019
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6. Named defendant(s) in the complaint:

JUUL Labs, Inc. F/K/A PAX Labs, Inc.; James Monsees; Adam Bowen; Nicholas Pritzker; Hoyoung Huh; Riaz Valani; Altria Group, Inc.; Altria Client Services LLC; Altria Group Distribution Company; AND Philip Morris USA, Inc.

7. Name, firm, and e-mail address of principal attorney(s) representing You:

Name:

Jonathan P. Kieffer

Firm:

Wagstaff & Cartmell LLP

Email address:

jpkieffer@wcllp.com

II. SCHOOL DISTRICT DATA

8. Total number of schools in Plaintiff's district:
107

9. Number of high schools in Plaintiff's district:
22

10. Number of middle schools in Plaintiff's district:
13

11. Number of elementary schools in Plaintiff's district:
64

12. Total number of students in Plaintiff's district:
51,898

13. In any of the past 10 (ten) years has the total number of students in Plaintiff's district been 20% more or 20% less than the figure reported in Question No. 12?

Choose Yes/No: No

If yes, please state the total number of students within Plaintiff's district for each such year, or if that information isn't reasonably available, give a description of the approximate student population change over the last 10 years.

14. Have You or any schools in Your district had any communications or interactions with any of the Defendants for any reason, including in connection with anti-smoking programs or youth vaping programs?

Choose Yes/No: No

If yes, for each communication or interaction, state (1) the date the communication or interaction occurred; (2) the nature of the communication or interaction; and (3) summarize Your portion of the communication.

SFUSD representatives have not had direct contact with Juul representatives. However, Juul approached a consultant from the Adolescent Health Working Group, a collaboration between the City of San Francisco and SFUSD, to offer funding. The funding was not accepted.

III. PERSONS WITH RELEVANT KNOWLEDGE

15. Please identify the person(s) who held the following position(s) or their equivalent in Plaintiff's District, since 2012:

a. Superintendent(s):

2012-2016 Richard Carranza;

2016-2017 Myong Leigh;

2017- present Vincent Matthews, Ed.D.

b. Vice or Assistant Superintendent(s):

Deputy Superintendents:

2012-2017 Guadalupe Guererro;

2018-2019 Brad Stam;

2019-present Enikia Ford Morthel.

16. Please identify the person(s) in Plaintiff's district most knowledgeable about student use on school property of tobacco or nicotine products, e-cigarettes and vaping products, alcohol, drugs, or other illicit substances, and the impact of such use on Plaintiff's district, from 2012 – present.

Quarry Pak (Program Administrator, 2015-2020; Wellness Counselor, 2012-2015)

Erica Lingrell (Program Administrator, 2015-2020)

Kim Coates (Director, Executive Director, 2012-2020)

Kevin Gogin (Director, 2013-2020)

Kim Levine (Health Program Coordinator 2003-2018; Manager, 2018-2020)

Donna Blanchard (Supervisor, 2012-2015)

Mele Lau Smith (Deputy Superintendent, Student, Family, and Community Support Division, 3/20 to present)

Jolynn Washington (Director of Pupil Services, 7/2019 to present; Supervisor 2017-2019)

Thomas Graven (Executive Director of Pupil Services, 2014-2018)

Claudia Anderson (Executive Director of Pupil Services, 2012-2014)

IV. DAMAGES

17. Please state generally in what way or how You claim You have been damaged by Defendants' alleged acts at issue in this lawsuit.

SFUSD has been damaged by Juul's actions as follows: (1) instructional time/attendance lost by students engaging in vaping; (2) health risks to students and school community; (3) time and costs to develop curriculum, education, training for school staff, students, parents/guardians/caregivers; (4) time and costs to offer supports/interventions/discipline; (5) administrative time spent on developing new board policies and regulations to address vaping.

18. Are You seeking any monetary damages?

Choose Yes/No: Yes

If Yes, identify each category of damages or monetary relief that You allege. This request is not designed to require an expert evaluation.

Plaintiff is seeking damages for all expenses necessary to address, and remedy, the electronic-cigarette and vaping problems in Plaintiff's schools. These damages include, but are not limited to: staff resources for on-campus monitoring and prevention; staff resources for on-campus prevention education; resources for community and parent prevention education outreach; staff resources for student academic and other support; resources for development and deployment of prevention curricula; resources for addiction counseling and treatment; additional resources for acquisition and installation of prevention technology, where appropriate; resources for signage and physical modification to premises, where appropriate; human and technical resources for monitoring and prevention related to school-sponsored activities off campus (including, for example, on school buses and at sporting and extra-curricular activities); resources related to student discipline and legal proceedings; resources to establish and maintain peer-to-peer mentorship and prevention programming; resources for development and deployment of media and targeted marketing campaigns to support prevention education; resources for storage and/or disposal of confiscated product, as appropriate; compensation to the divisions or departments in the [school district/county] impacted by the vaping epidemic; and such other additional resources related to the prevention and/or ongoing treatment of harms associated with the vaping epidemic as may be recommended by appropriate subject matter experts.

19. Are You seeking damages or other monetary relief based in whole or in part on personal injury to any individual(s)?

Choose Yes/No: No

If Yes, identify each individual and the alleged personal injury:

20. Are You seeking injunctive relief?

Choose Yes/No: No

If Yes, identify each category of injunctive relief that you seek. This request is not designed to require an expert evaluation:

21. Are You seeking abatement?

Choose Yes/No: Yes

If Yes, identify each category of abatement that You seek. This request is not designed to require an expert evaluation:

Plaintiff is seeking abatement for all resources necessary to address, and remedy, the electronic-cigarette and vaping problems in Plaintiff's schools. This includes, but is not limited to: staff resources for on-campus monitoring and prevention; staff resources for on-campus prevention education; resources for community and parent prevention education outreach; staff resources for student academic and other support; resources for development and deployment of prevention curricula; resources for addiction counseling and treatment; resources for acquisition and installation of prevention technology, where appropriate; resources for signage and physical modification to premises, where appropriate; human and technical resources for monitoring and prevention related to school sponsored activities off campus (including, for example, on school buses and at sporting and extra-curricular activities); resources related to student discipline and legal proceedings; resources to establish and maintain peer-to-peer mentorship and prevention programming; resources for development and deployment of media and targeted marketing campaigns to support prevention education; resources for storage and/or disposal of confiscated product, as appropriate; resources to the impacted divisions or departments in the [school/county] related to the ongoing funding of existing programs and services, the expansion of such programs and services, and the creation of new programs and services sufficient to abate the harms related to the vaping epidemic; and such other additional resources related to the prevention and/or ongoing treatment of harms associated with the vaping epidemic as may be recommended by appropriate subject matter experts.

22. Identify the approximate date (*i.e.*, month and year) when You claim You were first injured and began to incur damages as a result of Defendants' alleged conduct. This request is not designed to require an expert evaluation.

Plaintiff has experienced a significant and increasing problem with student use of electronic-cigarettes on campus for the last several school years. Although Plaintiff is unable to pinpoint a specific month and year when the problem began, it continued and increased throughout the 2017-2018 and 2018-2019 school years and it remains a significant problem. Plaintiff later became aware of statements by public health authorities and regulators attributing the cause of the youth vaping epidemic primarily to the actions of JUUL Labs, Inc.

23. Have You been involved in any e-cigarette or vaping related lawsuit in the past?

Choose Yes/No: No

If yes, for each lawsuit, state (1) the court in which the lawsuit was filed; (2) the case name; (3) the civil action or docket number assigned to the lawsuit; and (4) a description of your involvement or claims in the lawsuit.

V. VAPING AND E-CIGARETTE RELATED SERVICES AND PROGRAMS

24. Have You formed or participated in any task force, other program, or group to address any issue related to vaping or e-cigarettes from 2012 – present?

Choose Yes/No: Yes

If yes, identify the name of any such program(s) and the date of formation:

SFUSD has formed or participated in the following task forces/groups to address vaping or e-cigarettes from 2012 to the present: (1) SF Tobacco Free Coalition (1988); (2) Adolescent Health Working Group (2003); (3) Tobacco Use Prevention Education Advisory Council (2012)

25. Have You provided any vaping or e-cigarette prevention or education classes or programs in Your schools from 2012 – present?

Choose Yes/No: Yes

If yes, identify the program's name and the dates it was in existence:

SFUSD has provided the following vaping or e cigarette education classes from 2012 to the present: Middle School and High School Health Education vaping prevention lessons have been provided from fall 2012 to the present. SFUSD Comprehensive Health Education Policy includes middle and high school lessons related to tobacco use prevention, including lessons on e-cigarettes and vaping. At the elementary school level, there are 20 health education lessons provided to students including a subset of lessons on tobacco. These lessons have been provided since 2013.

26. Have You provided any vaping or e-cigarette cessation classes or programs in Your schools from 2012 – present?

Choose Yes/No: Yes

If yes, identify the program's name and the dates it was in existence:

Students have received vaping/e-cigarette cessation classes/programs in schools including: (1) Breathe California from 2012 to 2019; (2) Brief Intervention Services from 2012 to present (3) Peer Health Education classroom presentations and school-wide events.

27. Have You received any grant, donation, or other funding designated for or allocated to addressing issues relating to vaping or e-cigarettes from 2012 – present?

Choose Yes/No: Yes

If yes, provide a general description of grant/donation/funding.

Grants, donations or funding received or designated to address vaping or e-cigarettes from 2012-present (1) Tobacco Use Prevention Education (TUPE) Grant (2012-Present); (2) County Technical Assistance for TUPE (2017-2020); (3) County Technical Assistance Leadership Funds (2012-2020); (4) TUPE County Technical Assistance Funds Grant (2020-21)

28. Generally describe your efforts, if any, to limit student access to e-cigarettes or vaping products while on school property from 2012 – present.

Efforts to limit student access to e-cigarettes or vaping products on campuses from 2012 to the present include:

- (1) Adoption of Board Policy 5140.2 (Use of Alcohol, Tobacco, and Other Drugs)(May 13, 2014) Board Policy 5140.2
- (2) Adoption of Board Resolution SFUSD BOE Resolution Prohibiting Sale of E Cigarettes
- (2) Youth Outreach Workers (peer education influence model including vaping prevention presentations and school-wide events, youth-led anti-vaping Public Service Announcement and Art contest.);
- (3) Partnership with SF Department of Public Health Community Action Model tobacco control campaigns with community partners and youth leaders including: vaping and e-cigarette health curriculum translation, community clean up days for cigarette and vaping waste, vape buy-back programs at school sites.
- (4) Provision of vaping/tobacco counseling, intervention and cessation through Breathe California Quit Groups, 1:1 Brief Intervention Services, tobacco awareness sessions; and referrals to the California Smokers' Helpline and phone quit apps.
- (5) School district nurses, school social workers and counselors provided 3-session counseling services that are based in motivational interviewing and tobacco intervention. Quit groups meet for 5-6 sessions to learn about identifying triggers and quitting strategies.
- (6) Middle school and high school counselors, deans and health and wellness staff provided parent counseling when their students were caught vaping or in possession of vaping paraphernalia on campus, informational materials and workshops at Back to School Nights, Open Houses and Parent, Teacher and Student Association (PTSA) meetings.
- (7) Middle and High School teachers are trained annually on the basics and updated known facts about vaping and how to teach students about the scientific facts of tobacco and vaping use, build students' media literacy about the tobacco and vaping industry marketing tactics to young people, African Americans and the lesbian, gay, bisexual and transgender community. New Middle and High School School District Nurses, School Social Workers and counselors are trained annually in Brief Intervention Services.
- (8) Educational materials including: healthy and unhealthy pig lungs, vaping information pamphlets, postcards, posters and aerosol/vapor demonstration kits and quit kit materials including water bottles, fidget toys, and other vaping/smoking alternatives.

VI. POLICIES AND REPORTS RELATING TO E-CIGARETTES, TOBACCO, ALCOHOL, DRUGS, AND OTHER ILLICIT SUBSTANCES

29. Do You possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of or describes the prevalence of tobacco or nicotine products use in Your district?

Choose Yes/No: Yes

If yes, please provide a copy of any such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business, and without identifying any student-specific data, from 2012 – present.

- CHKS (California Healthy Kids Survey)
- YRBS (Youth Risk Behavior Survey, administered in cooperation with the Centers for Disease and Control (CDC))
- California Student Tobacco Survey

30. Do You possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of or describes the prevalence of vaping or e-cigarette use in Your district?

Choose Yes/No: Yes

If yes, please provide a copy of any such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business, and without identifying any student-specific data, from 2012 – present.

See Response and Attachments at 29.

31. Do You possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of or describes the prevalence of alcohol use in Your district?

Choose Yes/No: Yes

If yes, please provide a copy of any such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business, and without identifying any student-specific data, from 2012 – present.

- CHKS (California Healthy Kids Survey)

- YRBS (Youth Risk Behavior Survey, administered in cooperation with the Centers for Disease and Control (CDC))

See attachments at 29.

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32. Do You possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of or describes the prevalence of drug use in Your district?

Choose Yes/No: Yes

If yes, please provide a copy of any such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business, and without identifying any student-specific data, from 2012 – present.

CHKS (California Healthy Kids Survey)

YRBS (Youth Risk Behavior Survey, administered in cooperation with the Centers for Disease and Control (CDC))

See attachments at 29.

33. Do You possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of or describes the prevalence of use of other illicit substances in Your district?

Choose Yes/No: Yes

If yes, please provide a copy of any such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business, and without identifying any student-specific data, from 2012 – present.

CHKS (California Healthy Kids Survey)

YRBS (Youth Risk Behavior Survey, administered in cooperation with the Centers for Disease and Control (CDC))

See Attachments at 29.

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34. Do You possess any disciplinary codes, policies or codes of conduct that address use of tobacco or nicotine products e-cigarette or vaping products, alcohol, drugs, or other illicit substances?

Choose Yes/No: Yes

If yes, please attach copies of the relevant codes or policies from 2012 – present.

BP 5140.2 (Use of Alcohol, Tobacco, and Other Drugs)

BP 5144.1 (Suspension and Expulsion/Due Process)

AR 5144.1 (Suspension and Expulsion/Due Process)

2020-2021 SFUSD Student Handbook (Chapter 6 Student Discipline (pgs. 179-212); Behavior Intervention and Support Discipline Primary Matrix (pgs. 188-190); Behaviors Involving Drugs, Alcohol, Tobacco (pg. 194).

35. Do You possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of interventions, discipline or other consequences imposed on students for using tobacco or nicotine products on school premises?

Choose Yes/No: Yes

If yes, please produce a copy of any such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business, and without identifying any student-specific data, from 2012 – present.

2013-2014 to 2019-2020 Suspensions for Tobacco or Drug-related violations

36. Generally describe Your efforts, if any, to limit use of tobacco or nicotine products in the schools in Your district from 2012-present.

There are multi-tiered efforts to combat the use of tobacco and nicotine on school campuses include:

- District-wide Tobacco-free policy with policy dissemination and posting of signs on all campuses
 - Health Education at the Elementary, Middle and High School levels including tobacco, nicotine, e-cigarette and vaping lessons in grades 4-12.
 - Youth Outreach Worker program including peer classroom presentations and school-wide events
 - Health surveillance efforts through the use of student surveys such as California Healthy Kids Survey and the Youth Risk Behavior Survey to track student tobacco use.
 - Brief Intervention Services and Referrals to cessation services as an educational and supportive approach that is an alternative to suspension of students
 - Behavior Matrix that outlines the school district policy of education and support services
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37. Do You possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of interventions, discipline or other consequences imposed on students for using e-cigarette or vaping products on school premises?

Choose Yes/No: Yes

If yes, please produce a copy of any such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business, and without identifying any student-specific data, from 2012 – present.

2013-2014 to 2019-2020 Suspensions for Tobacco or Drug-related violations

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38. Generally describe Your efforts, if any, to limit use of e-cigarette or vaping products in the schools in Your district from 2012 – present.

There are multi-tiered efforts to combat the use of tobacco and nicotine on school campuses include:

- District-wide Tobacco-free policy with policy dissemination and posting of signs on all campuses, including vaping and e-cigarette use
- Health Education at the Elementary, Middle and High School levels including tobacco, nicotine, e-cigarette and vaping lessons in grades 4-12.
- Youth Outreach Worker program including peer classroom presentations and school-wide events
- Health surveillance efforts through the use of student surveys such as California Healthy Kids Survey and the Youth Risk Behavior Survey to track student tobacco and vaping use.
- Brief Intervention Services and Referrals to cessation services as an educational and supportive approach that is an alternative to suspension of students
- Behavior Matrix that outlines the school district policy of education and support services

39. Do You possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of interventions, discipline or other consequences imposed on students for using alcohol on school premises?

Choose Yes/No: ^{Yes} _____

If yes, please produce a copy of any such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business, and without identifying any student-specific data, from 2012 – present.

2013-2014 to 2019-2020 Suspensions for Tobacco or Drug-related violations

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40. Generally describe Your efforts, if any, to limit use of alcohol in the schools in Your district from 2012 – present.

- Safe and Drug Free School Board Policy
- Health Education lessons in middle and high school
- Brief Intervention Services for students caught using alcohol or in possession on campus
- Referrals to healthcare providers and counseling services as needed
- Health surveillance efforts through the use of student surveys such as California Healthy Kids Survey and the Youth Risk Behavior Survey to track student alcohol use.
- Behavior Matrix that outlines the school district policy of education and support services

41. Do You possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of interventions, discipline or other consequences imposed on students for using drugs on school premises?

Choose Yes/No: Yes

If yes, please produce a copy of any such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business, and without identifying any student-specific data, from 2012 – present.

2013-2014 to 2019-2020 Suspensions for Tobacco or Drug-related violations

42. Generally describe Your efforts, if any, to limit use of drugs in the schools in Your district from 2012 – present.

- Safe and Drug Free School Board Policy
- Health Education lessons in middle and high school
- Brief Intervention Services for students caught using drugs or in possession on campus
- Referrals to healthcare providers and counseling services as needed
- Health surveillance efforts through the use of student surveys such as California Healthy Kids Survey and the Youth Risk Behavior Survey to track student drug use.
- Behavior Matrix that outlines the school district policy of education and support services

43. Do You possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of interventions, discipline or other consequences imposed on students for using other illicit substances on school premises?

Choose Yes/No: Yes

If yes, please produce a copy of any such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business, and without identifying any student-specific data, from 2012 – present.

2013-2014 to 2019-2020 Suspensions for Tobacco or Drug-related violations

44. Generally describe Your efforts, if any, to limit youth use of other illicit substances in the schools in Your district from 2012 – present.

- Safe and Drug Free School Board Policy
- Health Education lessons in middle and high school
- Brief Intervention Services for students caught using other illicit substances or in possession on campus
- Referrals to healthcare providers and counseling services as needed
- Health surveillance efforts through the use of student surveys such as California Healthy Kids Survey and the Youth Risk Behavior Survey to track student use.
- Behavior Matrix that outlines the school district policy of education and support services

45. Do You possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of or describes expenditures that You made to address use of tobacco or nicotine products in Your district?

Choose Yes/No: Yes

If yes, please produce a copy of such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business from 2012 – present.

TUPE Expenditure Reports

46. Do you possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of or describes expenditures that You made to address use of vaping or e-cigarettes in Your district?

Choose Yes/No: Yes

If yes, please produce a copy of such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business from 2012 – present.
See attachment 45.

47. Do you possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of or describes expenditures that You made to address use of alcohol in Your district?

Choose Yes/No: No

If yes, please produce a copy of such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business from 2012 – present.

48. Do you possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of or describes expenditures that You made to address use of drugs in Your district?

Choose Yes/No: No

If yes, please produce a copy of such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business from 2012 – present.

49. Do you possess any existing report, survey, analysis, study or other document that tracks or otherwise provides an overview of or describes expenditures that You made to address use of other illicit substances in Your district?

Choose Yes/No: No

If yes, please produce a copy of such reports, surveys, analyses, studies, or other documents as they are kept in the ordinary course of business from 2012 – present.

CERTIFICATION

I declare under penalty of perjury that all of the information provided in this Plaintiff Fact Sheet is complete, true, and correct to the best of my knowledge and information, and that I have provided all of the requested documents that are reasonably accessible to me and/or my attorneys, to the best of my knowledge

Quarry Pak

Signature

12/21/2020

Date

Quarry Pak

Name (Printed)

Student Health Department Program Administrator

Title